

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NORTH DAKOTA  
BISMARCK DIVISION

STATE OF IOWA, et al.,

Plaintiffs,

v.

COUNCIL ON ENVIRONMENTAL  
QUALITY, and BRENDA MALLORY, in her  
official capacity as Chair,

Defendants,

Case No. 1:24-cv-00089-DMT-CRH

ALASKA COMMUNITY ACTION ON  
TOXICS; CENTER FOR BIOLOGICAL  
DIVERSITY; CENTER FOR  
ENVIRONMENTAL HEALTH; CENTER FOR  
FOOD SAFETY; ENVIRONMENTAL LAW  
AND POLICY CENTER; ENVIRONMENTAL  
PROTECTION INFORMATION CENTER;  
FOOD & WATER WATCH; FORT  
BERTHOLD POWER; FRIENDS OF THE  
EARTH; GREEN LATINOS; LABOR  
COUNCIL ON LATIN AMERICAN  
ADVANCEMENT; MĀLAMA MĀKUA;  
NATIONAL PARKS CONSERVATION  
ASSOCIATION; NATIONAL WILDLIFE  
FEDERATION; OCEAN CONSERVANCY;  
PEOPLE’S COLLECTIVE FOR  
ENVIRONMENTAL JUSTICE; RIO GRANDE  
INTERNATIONAL STUDY CENTER;  
SOUTHERN UTAH WILDERNESS  
ALLIANCE; WE ACT FOR  
ENVIRONMENTAL JUSTICE; THE  
WILDERNESS SOCIETY, and WINTER  
WILDLANDS ALLIANCE,

Applicant-Intervenor-Defendants.

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**MOTION TO INTERVENE**

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Alaska Community Action on Toxics, Center for Biological Diversity, Center for Environmental Health, Center for Food Safety, Environmental Law and Policy Center, Environmental Protection Information Center, Food & Water Watch, Fort Berthold POWER, Friends of the Earth, Green Latinos, Labor Council on Latin American Advancement, Mālama Mākua, National Parks Conservation Association, National Wildlife Federation, Ocean Conservancy, People’s Collective for Environmental Justice, Rio Grande International Study Center, Southern Utah Wilderness Alliance, WE ACT for Environmental Justice, The Wilderness Society, and Winter Wildlands Alliance (collectively, “Applicants”) respectfully move under Federal Rule of Civil Procedure 24 to intervene as defendants in this action. A memorandum in support of this motion, proposed answer, and declarations from the movants are filed contemporaneously with the motion. Undersigned counsel have conferred with Plaintiffs and the Federal Defendants about this motion. Plaintiffs and the Federal Defendants take no position on this motion.

Dated this 27th day of June, 2024.

s/ Jan E. Hasselman

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*Attorneys for Applicant-Intervenor-Defendants  
Alaska Community Action on Toxics, et al.*

CERTIFICATE OF SERVICE

I hereby certify that on June 27, 2024, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send notification of this filing to the attorneys of record and all registered participants.

Dated: June 27, 2024.

s/ Jan E. Hasselman  
Jan E. Hasselman